

From: [David Nichols - NOAA Federal](#)
To: [Gordon, Stephanie \(Skophammer\)](#)
Subject: Re: Pacific Islands Region Aquaculture Plan - PEIS
Date: Friday, August 26, 2016 10:37:38 AM
Attachments: [2016-08-26 PIR Aquaculture brief.docx](#)

Stephanie - I apologize that the cooperating agency request hasn't gone out yet. I expect EPA to receive it next week.

It would be a great idea to arrange a time to talk. I will work to get our cooperating agency request letters out and we can then work on scheduling a time to talk. In the meantime, I am attaching one of our briefing memos that provides a little more information (including an ambitious timeline).

Aloha,
David

On 8/26/2016 5:35 AM, Gordon, Stephanie (Skophammer) wrote:

> HI David,
> I noticed that NOAA published their Notice of Intent for the Pacific Islands aquaculture Programmatic this week in the federal register.
> Are you still planning to send us a cooperating agency request letter?
> I want to make sure it didn't miss its arrival.
>
> EPA is planning to prepare scoping comments. I would be interested in arranging a time to talk about the current status with the project, so that our comments can be the most helpful.
> Thanks,
> Stephanie
>
> Stephanie Skophammer Gordon
> U.S. Environmental Protection Agency, Region 9
> Environmental Review Section (ENF-4-2)
> 75 Hawthorne St.
> San Francisco, CA 94105
> (415) 972-3098
> New email: gordon.stephanieS@epa.gov
> Note the S before the @
>
>
>

> -----Original Message-----

> From: David Nichols - NOAA Federal [<mailto:david.nichols@noaa.gov>]
> Sent: Wednesday, June 15, 2016 3:17 PM
> To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
> Cc: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>; Melanie Brown - NOAA Federal <melanie.brown@noaa.gov>; Anne Southam <anne@eco49.com>; eata >> Kevin Kelly <eatahi@hotmail.com>
> Subject: Re: Pacific Islands Region Aquaculture Plan - PEIS
>
> Thank you, Stephanie!
>

> On 6/15/2016 12:10 PM, Gordon, Stephanie (Skophammer) wrote:

>> Hello Mr. Nichols,
>> I am a colleague of Elizabeth's at the EPA, but I am in the Environmental Review Office. Our group reviews NEPA documents produced by other federal agencies in our Region 9 (Pacific Islands, HI, NV, AZ, and CA). We

review EAs, PEIS, DEIS, FEIS, and so forth and are a cooperating agency on a few of them.

>>

>> Please send the formal cooperating agency request to the address and contact below. Feel free to email me a copy as well.

>>

>> Please address and send it to:

>> Kathleen Goforth

>> U.S. EPA

>> Environmental Review Office, ENF-4-2

>> 75 Hawthorne Street

>> San Francisco, CA 94105

>>

>> If you have any questions, please don't hesitate to give me a call!

>> I would also anticipate submitting scoping comments once you file your NOI with the federal register. If you have any questions about that process, I can try to answer them and have a contact that helps with that as well.

>> -Stephanie

>>

>> Stephanie Skophammer Gordon

>> U.S. Environmental Protection Agency, Region 9 Environmental Review

>> Section (ENF-4-2)

>> 75 Hawthorne St.

>> San Francisco, CA 94105

>> (415) 972-3098

>> New email: gordon.stephanieS@epa.gov

>> Note the S before the @

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>>

>>

>> -----Original Message-----

>> From: Sablad, Elizabeth

>> Sent: Wednesday, June 15, 2016 10:42 AM

>> To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>;

>> Goforth, Kathleen <Goforth.Kathleen@epa.gov>

>> Cc: Smith, DavidW <Smith.DavidW@epa.gov>

>> Subject: FW: Pacific Islands Region Aquaculture Plan - PEIS

>>

>> Hi Stephanie and Kathy,

>> Are you aware of this PEIS? Please let me know who to work with in your office. Thanks!

>>

>> -Elizabeth

>>

>> Elizabeth Sablad

>> NPDES Permits Office

>> U.S. EPA Region 9

>> 75 Hawthorne St. (WTR-2-3)

>> San Francisco, CA 94105

>> (415) 972-3044

>> sablad.elizabeth@epa.gov

>>

>> -----Original Message-----

>> From: David Nichols - NOAA Federal [<mailto:david.nichols@noaa.gov>]

>> Sent: Wednesday, June 15, 2016 10:38 AM

>> To: Sablad, Elizabeth <Sabad.Elizabeth@epa.gov>

>> Subject: Pacific Islands Region Aquaculture Plan - PEIS

>>

>> Aloha Ms. Sablad -

>>

>> My name is David Nichols - the new Aquaculture coordinator for NOAA is the Pacific Islands Region. One of my first responsibilities is to coordinate the planning and development of a Programmatic Environmental Impact Statement for an Aquaculture Management Program in the Pacific Islands Region. We are in the very initial stages and have acquired a contractor to help with the NEPA analysis.

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>> We have a very ambitious timeline to get to a final PEIS and one of the first steps is to establish the cooperating agencies and develop the appropriate MOUs as necessary. I would like to invite the EPA to participate as a cooperating agency in the development of this plan. I will also be contacting the ACOE and USCG as well.

>>

>> I have a lot more information but I don't want to overwhelm anyone just yet. I just wanted to reach out and establish the appropriate contacts.

>>

>> Thank you,

>> David Nichols

>>

>> --

>> NMFS/PIRO/Sustainable Fisheries Division NOAA Inouye Regional Center

>> (IRC)

>> 1845 Wasp Blvd., Building 176

>> Honolulu, HI 96818

>> Phone #: (808) 725-5180

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Proposed Pacific Islands Region (PIR) Aquaculture Management Program

NMFS is conducting a NEPA analysis and decision-making process for a proposed aquaculture management program in Federal waters of the Pacific Islands Region (PIR). We have begun scoping for the project with the intent that interested parties may participate and contribute to the development of a final set of alternatives and analysis of environmental effects for NMFS and the Western Pacific Fishery Management Council (Council) to consider.

- Current aquaculture facilities in the region are mainly in nearshore State waters. Small offshore test projects have shown that with careful planning and the inclusion of mitigation measures in standard operating procedures, aquaculture practitioners can conduct offshore aquaculture with few adverse environmental impacts.
- With the exception of coral reef ecosystem species, which require a Special Coral Reef Ecosystem Fishing Permit, there is no requirement for Federal permits to conduct aquaculture in Federal waters. Without a management program, future aquaculture operations would develop in an ad hoc manner without federal review or control of the what (species), when, where or how of an operation.
- The Council recommended amending the five regional fishery ecosystem plans (FEPs) to establish a management program for aquaculture fisheries and NMFS is working with the Council to develop a management program that would regulate and promote environmentally sound and economically sustainable aquaculture in the region.

Since 2008, the Council has made several recommendations to NMFS regarding an aquaculture program. In October 2009, the Council recommended establishing aquaculture requirements in all five FEPs. In March 2010, the Council recommended that aquaculture operations follow a Council-established review process and that the FEPs should include a limit on the number of aquaculture operations. In June 2010, the Council recommended permitting and reporting for aquaculture operations including criteria for a limited entry program and environmental monitoring of production wastes. In June 2011, the Council clarified that it needed to identify user capacity and conflicts, feed analysis, institutional capacity, etc., before considering a limited entry program. The Council further recommended incorporating environmental monitoring, inspection, and reporting requirements into the permitting amendment that are consistent with requirements already in place by the State of Hawaii or proposed through other regional/national organizations.

The proposed FEP amendments would establish a federal management program for aquaculture fisheries in the EEZ (generally 3 – 200 nm) around islands of American Samoa, Guam, Hawaii,

the Pacific Remote Islands, and the Commonwealth of the Northern Mariana Islands. The action area analyzed in the PEIS will depend on the alternatives developed for aquaculture locations.

Up to now, PIRO has permitted a series of three aquaculture research projects in the U.S. EEZ around the Island of Hawaii under the Special Coral Reef Ecosystem Fishing Permit provisions in 50 CFR 665.224. The regulations allow NMFS to review and, if appropriate, permit the harvest of coral reef ecosystem management unit species using gear that is not otherwise allowed by regulation. This individual project-based permitting process is resource-intensive and not timely for both the applicant and for PIRO, due to the analysis and coordination required to support each individual permit.

In 2011, Food and Water Watch sued NMFS, claiming that we did not have the legal authority to grant fishing permits for aquaculture. In 2013, the Ninth Circuit Court of Appeals affirmed a lower court's ruling that NMFS properly used a SCREFP to authorize the culture and harvest of coral reef MUS using an unapproved gear type, i.e., offshore net pen aquaculture.

At this early stage of project planning, features of the PIR aquaculture management program would include the following:

- Designating areas suitable for aquaculture development;
- Identifying suitable management unit species for aquaculture in the PIR; and
- Authorizing reasonably foreseeable types of offshore aquaculture operations; and establishing gear, permitting, and reporting requirements.

This PEIS would analyze the potential impacts of an appropriate range and scope of federally-managed aquaculture operations on the environment. The PEIS would identify areas and species suitable for offshore aquaculture, the reasonably foreseeable types of offshore aquaculture operations, and the social, economic, and environmental impacts of such proposed activities. Completing a PEIS for a regional aquaculture management program would facilitate the review and processing of aquaculture fishery proposals, supporting future NEPA reviews for aquaculture fishery projects.

With the Draft PEIS, PIRO will work with the Council to develop the necessary FEP amendments to manage aquaculture fisheries in the region. Once the Council recommends the FEP amendments outlining specific features of an aquaculture management program, and if NMFS approves the amendments, implementing regulations would contain the management program requirements for participating in an aquaculture fishery in Federal waters in the region. Subsequently, we would evaluate each permit application for compliance with all applicable laws and regulatory requirements, including those specific to the aquaculture fishery.

NMFS has acquired ECS Federal, Inc. as the contractor responsible for developing the NEPA analysis, including but not limited to providing the following: a strategic plan and timeline,

scoping materials, scoping report, preliminary Draft PEIS outline, preliminary Draft PEIS and Final Draft PEIS, Comment and Response Report, and the Final PEIS.

Summary of desired schedule for developing the PEIS:

DATE	ACTION
June 2016	Strategic Plan for PEIS Completion Outlining Milestones and Timeline
July 2016	Public Scoping Materials Prepared / Draft PEIS outline
August 2016	Publication of Notice of Intent
September 2016	Begin Public Scoping for 60 days
November 2016	Complete PEIS scoping report
December 2016	Complete preliminary draft PEIS outline
February 2017	Complete preliminary draft PEIS
March 2017	Present preliminary draft PEIS to Council for recommendation of preliminary preferred alternative(s).
April 2017	Complete draft PEIS, publish with 60 days comment period
June 2017	Begin drafting final PEIS
August 2017	Complete final PEIS
September 2017	Publish final PEIS
October 2017	Draft Record of Decision
November 2017	Complete Record of Decision

From: [David Nichols - NOAA Federal](#)
To: [Gordon, Stephanie \(Skophammer\)](#)
Subject: Re: Pacific Islands Region Aquaculture Plan - PEIS
Date: Monday, August 29, 2016 1:22:58 PM
Attachments: [2016-08-29 AqPEIS CoopAgencyRequest EPA 0648-XE812.PDF](#)

Stephanie: The cooperating agency request went out to the EPA today. I am attaching the signed copy of the letter. Let me know if you have any questions.

Aloha,
David

On 8/26/2016 5:35 AM, Gordon, Stephanie (Skophammer) wrote:

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- > Environmental Review Section (ENF-4-2)
- > 75 Hawthorne St.
- > San Francisco, CA 94105
- > (415) 972-3098
- > New email: gordon.stephanieS@epa.gov
- > Note the S before the @
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>> -Stephanie

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>> Sent: Wednesday, June 15, 2016 10:42 AM
>> To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>;
>> Goforth, Kathleen <Goforth.Kathleen@epa.gov>
>> Cc: Smith, DavidW <Smith.DavidW@epa.gov>
>> Subject: FW: Pacific Islands Region Aquaculture Plan - PEIS

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>> Hi Stephanie and Kathy,
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>> -Elizabeth
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>> Elizabeth Sablad
>> NPDES Permits Office
>> U.S. EPA Region 9
>> 75 Hawthorne St. (WTR-2-3)
>> San Francisco, CA 94105
>> (415) 972-3044
>> sablad.elizabeth@epa.gov

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>> Subject: Pacific Islands Region Aquaculture Plan - PEIS

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>> Thank you,

>> David Nichols

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>> NMFS/PIRO/Sustainable Fisheries Division NOAA Inouye Regional Center

>> (IRC)

>> 1845 Wasp Blvd., Building 176

>> Honolulu, HI 96818

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Phone #: (808) 725-5180



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Pacific Islands Regional Office
1845 Wasp Blvd. Bldg. 176
Honolulu, Hawaii 96818
(808) 725-5000 • Fax (808) 725-5215

AUG 29 2016

Kathleen Goforth
U.S. EPA
Environmental Review Office, ENF-4-2
75 Hawthorne St.
San Francisco, CA 94105

Dear Ms. Goforth:

The National Marine Fisheries Service (NMFS), in coordination with the Western Pacific Fishery Management Council (Council), intends to prepare a Programmatic Environmental Impact Statement (PEIS) to analyze the potential environmental impacts an aquaculture management program for Federal waters of the U.S. Exclusive Economic Zone of the Pacific Islands. The PEIS would support offshore aquaculture development, including appropriate management unit species for aquaculture, reasonably foreseeable types of offshore aquaculture operations, and permitting and reporting requirements. On August 23, 2016, NMFS published a Notice of Intent to prepare the PEIS. Please see <https://www.regulations.gov/document?D=NOAA-NMFS-2016-0111>.

The Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) emphasizes agency cooperation early in the NEPA process. Section 1501.6 states: "...any other Federal agency which has special expertise with respect to any environmental issue, which should be addressed in the statement, may be a cooperating agency." Because the U.S. Environmental Protection Agency (EPA) has special expertise on National Pollution and Discharge Elimination System permitting and water quality issues related to aquaculture, I invite your agency to be a cooperating agency in the development the PEIS. If you agree, please identify a point of contact for us to work with.

We look forward to working with you. If you have any questions, please contact David Nichols at (808) 725-5180 or david.nichols@noaa.gov.

Sincerely,

Michael D. Tosatto
Regional Administrator

cc: Elizabeth Sablad – EPA NPDES Permits Office



From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Sablad, Elizabeth](#)
Subject: FW: Pacific Islands Region Aquaculture PEIS - Status Update
Date: Thursday, April 12, 2018 7:51:00 AM

NOAA was hoping to send us an ADEIS on April 16, but that was an unconfirmed date and I never heard back to my last email requesting two weeks. I'll let you know if I hear anything.

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9
Environmental Review Section (ENF-4-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
gordon.stephanieS@epa.gov

From: Gordon, Stephanie (Skophammer)
Sent: Tuesday, March 13, 2018 1:37 PM
To: 'David Nichols - NOAA Federal' <david.nichols@noaa.gov>
Cc: Anne Southam <anne@eco49.com>; Melanie Brown - NOAA Federal <melanie.brown@noaa.gov>
Subject: RE: Pacific Islands Region Aquaculture PEIS - Status Update

Two weeks of review would be better for me, however, I understand that your timelines are very tight. I can either review what I am able to get to in one week, or I can commit to providing comments on ch 1-3 in the first week and remaining comments the following week.

But overall, I am planning to be in the office this spring so I should be available to review the document.

Thanks for letting me know!

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9
Environmental Review Section (ENF-4-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
gordon.stephanieS@epa.gov

From: David Nichols - NOAA Federal [<mailto:david.nichols@noaa.gov>]
Sent: Thursday, March 08, 2018 4:26 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Cc: Anne Southam <anne@eco49.com>; Melanie Brown - NOAA Federal

<melanie.brown@noaa.gov>

Subject: Re: Pacific Islands Region Aquaculture PEIS - Status Update

Aloha Stephanie - We are making significant progress on our draft Aquaculture PEIS and are in the "home stretch". We have been playing around with a review schedule and currently hoping to have a draft to the EPA for comment around April 16th. I still need to confirm this timeline with our Assistant Regional Administrator. This would occur after a quick internal division review but before our NEPA and General Counsel review.

We are hoping for a quick turnaround. To help, I can highlight the relevant EPA components of the draft PEIS that you can be sure to review.

Let me know what you think. Hopefully you can work this in among all your other priorities. Would one week be enough time for an EPA final review or should I budget more?

Thanks,
David

On 3/8/2018 2:11 PM, Gordon, Stephanie (Skophammer) wrote:

Hi Anne-

Checking in. Should I expect something in the near future? Just wanted to make sure I didn't inadvertently miss something in Jan.

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9

Environmental Review Section (ENF-4-2)

75 Hawthorne St.

San Francisco, CA 94105

(415) 972-3098

New email: gordon.stephanieS@epa.gov

Note the S before the @

From: Anne Southam [<mailto:anne@eco49.com>]

Sent: Monday, December 04, 2017 3:01 PM

To: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>; Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Cc: David Nichols - NOAA Federal <david.nichols@noaa.gov>; Melanie Brown - NOAA Federal <melanie.brown@noaa.gov>; Kevin Kelly - NOAA Affiliate <kevin.kelly@noaa.gov>; Mike Payne <michael@eco49.com>

Subject: Re: Pacific Islands Region Aquaculture PEIS - Status Update

Hi Stephanie and Elizabeth,

Hope you are both well. Just another quick update that we're still working on some refinements to the draft chapters based on internal review. We tentatively hope to get you chapters by early January and wanted to check on your schedule that month. Do you have any conflicts in the first part of the year to work around?

Thanks so much!

Anne L. Southam
CEO
ECO49 Consulting, LLC
anne@eco49.com
Ph: 907-903-9714
www.eco49.com

On Nov 2, 2017, at 9:51 AM, Anne Southam <anne@eco49.com> wrote:

Hi Stephanie and Elizabeth,
Just a quick update on the status of the PIR Aquaculture PEIS. David and Melanie received some input from management that we need to incorporate a discussion on permitting into the alternatives chapter (Chapter 2) and the Program Implementation Chapter (5). This is a new element and they're working on it now.

This means we are a little behind schedule in getting you the document for review (previously scheduled for next week - Nov 6th). We're aiming to have Chapter 1-5 of the PEIS to you the week of November 13th for your review of select sections/chapters.

Let me know if you have any schedule conflicts in November that might affect your review period. If our timeline changes, I'll be sure to let you know.

Thanks!

Anne L. Southam
CEO
ECO49 Consulting, LLC
anne@eco49.com
Ph: 907-903-9714
www.eco49.com

From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Kozelka, Peter](#)
Subject: RE: Aquaculture in PIR - request to review draft PEIS
Date: Tuesday, August 25, 2020 11:45:00 AM

Okay great, glad to hear you're okay with me coordinating on this for now. I don't think it's a good use of your time to attend any meetings or long reviews. This was a pretty programmatic document and had little site-specific information. I think Elizabeth's main contribution before was working on a pre-application permitting checklist, I will see about digging that up.

I feel comfortable identifying areas that may need NPDES office expertise and keeping you guys informed.

From: Kozelka, Peter <Kozelka.Peter@epa.gov>
Sent: Tuesday, August 25, 2020 11:32 AM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Subject: RE: Aquaculture in PIR - request to review draft PEIS

Please go ahead and work with Tori on this. And you can inform me later.

I've asked Elizabeth for some additional staff support on various duties that I currently have, so its possible that someone else from NPDES will become involved.

AND we can should consider coordinating with Hudson Slay on this.....not entirely sure if it is within his new scope of duties.

From: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Sent: Tuesday, August 25, 2020 11:04 AM
To: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Cc: Kozelka, Peter <Kozelka.Peter@epa.gov>; Sablad, Elizabeth <Sablاد.Elizabeth@epa.gov>
Subject: RE: Aquaculture in PIR - request to review draft PEIS

Hi Tori,

Nice to meet you and thank you for your note. I have been thinking about this project because of last week's announcement for the aquaculture opportunity zones in southern Ca and wondering about the similarities and differences between that and this programmatic. I'm glad you reached out as I didn't know who took over David's position.

Let's talk soon. I am around this week and next and so we should set up a call.

I am in the NEPA office at EPA so we review and comment on all federal EISs that come through Region 9 (CA, AZ, NV, HI, Pacific). We definitely want to review administrative drafts before the public review period so we can provide early input or assist NOAA and especially provide input on any EPA programs that may be affected.

I'm looking forward to our chat, just let me know what works for you. I am free Thursday morning and all day Friday this week. Let's talk NEPA process and timeline and then we can figure out the best way to rope in the permitting folks.

-Steph

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9

Environmental Review Branch (TIP-2)

75 Hawthorne St.

San Francisco, CA 94105

(415) 972-3098

gordon.stephanieS@epa.gov

From: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>

Sent: Tuesday, August 25, 2020 6:00 AM

To: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Cc: Kozelka, Peter <Kozelka.Peter@epa.gov>; Gordon, Stephanie (Skophammer)

<GORDON.STEPHANIES@EPA.GOV>

Subject: RE: Aquaculture in PIR - request to review draft PEIS

Hi Tori,

Good to meet you! Yes, we did review an early draft of this PEIS. I can't remember if it was the full draft or pieces but it was probably about 2 years ago now. I am now the manager of the NPDES Permits Section, but Peter Kozelka of my office and Stephanie Gordon of our NEPA office can definitely work with you to review a new version. One of them will follow up and set up some time with you.

Thanks,

Elizabeth

Elizabeth Sablad

Supervisor

NPDES Permits Section (WTR-2-3)

U.S. Environmental Protection Agency, Region 9

75 Hawthorne St.

San Francisco, CA 94105

(415) 972-3044

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Sent: Monday, August 24, 2020 7:00 PM

To: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>; Gordon, Stephanie (Skophammer)

<GORDON.STEPHANIES@EPA.GOV>

Subject: Aquaculture in PIR - request to review draft PEIS

Aloha Elizabeth and Stephanie,

I hope this message finds you well! I'm writing to both introduce myself and start a conversation

about seeking EPA's review of an upcoming draft PEIS.

So, first off, hello! I am the regional Aquaculture Specialist for the PIR and began working in this position in February of this year. Previously, I've worked in the seafood industry as an auditor for eco-certifications (e.g. EU Organic, Whole Foods internal sourcing standards, Aquaculture Stewardship Council, etc.) and most recently I was working as a senior aquaculture scientist for Seafood Watch at the Monterey Bay Aquarium.

Right now one of my primary responsibilities is to complete the draft [PEIS](#) for aquaculture, with the long-term goal of developing a permitting program for offshore aquaculture within the region (Hawaii, Guam, CNMI, American Samoa).

We're inching closer to completing this draft (and subsequently, inching closer to public comment). We'd like to ensure the EPA has the opportunity to review and provide comments and both of you have been listed as reviewers in a previous draft.

Being new to this position (and NOAA), I'm curious to know:

1. Have you been consulted on this before? If so have you seen a full draft of the PEIS (and when?)?
2. Would you be interested in reviewing a draft in the next few months as we're preparing for public comment?

If you're willing/able to offer some review, I'd be happy to receive comments via phone/video call, email, or directly in the document itself. I recognize this may be a document you've seen before, so I'd also like to be sensitive to the fact that you may have already spent a fair amount of time in consultation on it!

Lastly, if you'd like to have a brief meet/greet call I'd love to set one up. I find it's much easier to communicate in other venues if we've at least had the chance to say 'hello' with a call or video chat.

Mahalo for your time,
Tori

Tori Spence McConnell (she/her/hers)
Fishery Policy Analyst--Aquaculture
Pacific Islands Regional Office (PIRO)
NOAA Fisheries | U.S. Department of Commerce
Office: +1 (808) 725-5186
www.fisheries.noaa.gov



From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Tori Spence - NOAA Federal](#)
Subject: RE: Aquaculture in PIR - request to review draft PEIS
Date: Friday, October 2, 2020 12:58:00 PM
Attachments: [Antibiotics and Therapeutants-Kona WQ data example.docx](#)

Hi Tori,

I am sorry it has been an entire month since I've gotten back to you about this working draft of the PEIS.

I reviewed most of the document (I did not focus so much on CH 3) and do not have any high level concerns or comments. I went back through and looked at my previous comments on the document, and I noticed it has a significant format change from the previous. We had a lot of comments previously on the Ch 5 Implementation Plan (which I'm assuming has largely been removed?) I think that used to have a lot more specifics regarding permitting timelines etc. which was our original interest in this project.

Is there any information from the Kampachi Kona project that could be useful to incorporate? I know it is mentioned in Ch3, but there was some information about the water quality in the old document. I pulled an example in the attached. It seems like supportive useful information, though I can't be sure where it originally came from. Kona Kampachi is really our only example of large scale finfish aquaculture in the US. I could look into this more if there is value.

I hope all is well and look forward to any increased coordination. Is there anything you would like from me?

If/when PIR has to do the Aquaculture Opportunities Zone EIS or mapping work, I would be interested. Hopefully a few years away...

Have a good weekend,

Stephanie

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9

Environmental Review Branch (TIP-2)

75 Hawthorne St.

San Francisco, CA 94105

(415) 972-3098

gordon.stephanieS@epa.gov

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Sent: Thursday, August 27, 2020 6:25 PM

To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Subject: Re: Aquaculture in PIR - request to review draft PEIS

Aloha Stephanie,

I wanted to also pass along a working draft of the PEIS right now. This version is still going through review in our office and Ariel will be commenting on the next version that comes out of this round of comments so my goal is to do my best to have a draft that's easy for her to review. If possible we'd

like to have comments back by the end of September so we can move this forward; I'd be happy to chat on the call about timeframes that work for you and your schedule.

That being said, this is still the phase where the document isn't fully set in stone and there may also be some tweaks to the alternatives before it gets to Ariel.

When we chat tomorrow I can give you a little intro to it and answer any questions you may have before reviewing

Looking forward to our chat,
Tori

On Wed, Aug 26, 2020 at 12:08 PM Tori Spence - NOAA Federal <tori.spence@noaa.gov> wrote:

Hi Stephanie,

Great! I've sent a calendar invite for that time. Looking forward to meeting you!

Cheers,
Tori

On Wed, Aug 26, 2020 at 11:58 AM Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@epa.gov> wrote:

Tori,
Yes, Friday at 1 PDT sounds great. I will look forward to talking to you then. You can call me at my number below, or send me an invite link to a teams call.
-Stephanie

Stephanie Skophammer Gordon

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Environmental Review Branch (TIP-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
gordon.stephanieS@epa.gov

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Tuesday, August 25, 2020 7:56 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Cc: Kozelka, Peter <Kozelka.Peter@epa.gov>; Sablad, Elizabeth <Sablاد.Elizabeth@epa.gov>; Ariel Jacobs - NOAA Federal <ariel.jacobs@noaa.gov>
Subject: Re: Aquaculture in PIR - request to review draft PEIS

Hello Stephanie,

Fantastic to meet you and Peter! I hope you're both doing well-with all the fires it's been devastating to hear updates from my friends and colleagues in Monterey, and I understand the Bay Area hasn't escaped their path, either.

It seems like we'll have a bit to chat about with the AOAs stemming from the EO in May, as well as this PEIS and our process.

How does your Friday look? Perhaps something around 9 or 10am HST (12 or 1pm PDT)? I've also looped in our Sec 7 Coordinator, Ariel Jacobs.

Wishing you the best and hope you're staying safe and healthy,
Tori

On Tue, Aug 25, 2020 at 8:04 AM Gordon, Stephanie (Skophammer)
<GORDON.STEPHANIES@epa.gov> wrote:

Hi Tori,
Nice to meet you and thank you for your note. I have been thinking about this project because of last week's announcement for the aquaculture opportunity zones in southern Ca and wondering about the similarities and differences between that and this programmatic. I'm glad you reached out as I didn't know who took over David's position.
Let's talk soon. I am around this week and next and so we should set up a call.
I am in the NEPA office at EPA so we review and comment on all federal EISs that come through Region 9 (CA, AZ, NV, HI, Pacific). We definitely want to review administrative drafts before the public review period so we can provide early input or assist NOAA and especially provide input on any EPA programs that may be affected.

I'm looking forward to our chat, just let me know what works for you. I am free Thursday morning and all day Friday this week. Let's talk NEPA process and timeline and then we can figure out the best way to rope in the permitting folks.
-Steph

Stephanie Skophammer Gordon
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Environmental Review Branch (TIP-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
gordon.stephanies@epa.gov

From: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>
Sent: Tuesday, August 25, 2020 6:00 AM
To: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Cc: Kozelka, Peter <Kozelka.Peter@epa.gov>; Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Subject: RE: Aquaculture in PIR - request to review draft PEIS

Hi Tori,

Good to meet you! Yes, we did review an early draft of this PEIS. I can't remember if it was the full draft or pieces but it was probably about 2 years ago now. I am now the manager of the NPDES Permits Section, but Peter Kozelka of my office and Stephanie Gordon of our NEPA office can definitely work with you to review a new version. One of them will follow up and set up some time with you.

Thanks,
Elizabeth

Elizabeth Sablad
Supervisor
NPDES Permits Section (WTR-2-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3044

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Sent: Monday, August 24, 2020 7:00 PM

To: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>; Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Subject: Aquaculture in PIR - request to review draft PEIS

Aloha Elizabeth and Stephanie,

I hope this message finds you well! I'm writing to both introduce myself and start a conversation about seeking EPA's review of an upcoming draft PEIS.

So, first off, hello! I am the regional Aquaculture Specialist for the PIR and began working in this position in February of this year. Previously, I've worked in the seafood industry as an auditor for eco-certifications (e.g. EU Organic, Whole Foods internal sourcing standards, Aquaculture Stewardship Council, etc.) and most recently I was working as a senior aquaculture scientist for Seafood Watch at the Monterey Bay Aquarium.

Right now one of my primary responsibilities is to complete the draft [PEIS](#) for aquaculture, with the long-term goal of developing a permitting program for offshore aquaculture within the region (Hawaii, Guam, CNMI, American Samoa).

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Being new to this position (and NOAA), I'm curious to know:

1. Have you been consulted on this before? If so have you seen a full draft of the PEIS (and when?)?
2. Would you be interested in reviewing a draft in the next few months as we're preparing for public comment?

If you're willing/able to offer some review, I'd be happy to receive comments via phone/video call, email, or directly in the document itself. I recognize this may be a document you've seen before, so I'd also like to be sensitive to the fact that you may have already spent a fair amount of time in consultation on it!

Lastly, if you'd like to have a brief meet/greet call I'd love to set one up. I find it's much easier to communicate in other venues if we've at least had the chance to say 'hello' with a call or video chat.

Mahalo for your time,
Tori

Tori Spence McConnell (she/her/hers)
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4.1.1.1.1 Antibiotics and Therapeutants

The approval of disinfectants, antibiotics, and vaccines in aquaculture is administered by the U.S. FDA and regulations and protocols for their use is established through the National Aquatic Animal Health Plan (NMFS and USFWS 2008). Studies have estimated that 75-99% of antibiotics administered are released into the environment (Goldburg and Triplett 1997, Armstrong *et al.* 2005, Marine Aquaculture Task Force 2007), either dissolving into the water column or settling into the sediment (Rigos and Troisi 2005). A general improvement in treating diseases, primary due to a proven effectiveness and increased use of vaccines has led to a 95% reduction in antibiotic use (Gulf of Mexico Fishery Management Council 2009). Studies of the effects of antibiotics in the environment near aquaculture cages occasionally observed antibiotic resistant bacteria in sediment under the cages (Tamminen *et al.* 2010), but most studies found no persistent effects, with only trace residues observed 41 to 75 days after treatment in either the sediment or crustaceans below salmon net pens (Capone *et al.* 1996).

Potential permittees under all three alternatives would be required to adhere to U.S.EPA requirements of the CWA, with NPDES permit-specific water quality monitoring, standard operating procedures, mitigation measures and possibly chemical use prohibitions to ensure water quality standards are met (see Section 1.4.6). In addition all alternatives could only use FDA-approved antibiotics and associated chemicals. None of the alternatives have specific regulations for antifouling chemicals. Where ambient water quality may be lacking for a proposed project site, baseline environmental surveys required under Alternative 3 could provide this kind of relevant information to minimize damage to water quality.

The temporal effects on water quality from an aquaculture facility producing 100,000 lbs. (45 mt) per year could last up to one year under Alternative 1 for SCREFP permits, up to five years under Alternative 3 and up to 20 years under Alternative. For non-coral reef species under Alternative 1, there would be no NMFS permit and therefore, potential effects would depend on the duration of other agency-required permits but could be long-term. Spatial effects would be minor for all alternatives because while changes in water quality parameters may occur, they are not likely to exceed federal or state standards and would likely be diluted rapidly with increased distance from the pen. Effects on water quality are not likely to be notably different among the archipelagic regions.

Based on a long-term data set from the Blue Ocean Mariculture operation sited 0.5 miles off the Kona Coast of Hawaii, changes in nutrients are not likely to result in anything but minor effects on water quality as described in the numerous studies cited above. Of more than 20 studies of offshore facilities reviewed, none indicated more than a minor change in any of the measured physical parameters, suspended solids, or chlorophyll a. While potential impacts related to leaching of chemicals, and input of antibiotics and chemicals during operations is discussed in the literature, improvements in maintenance and husbandry over the past 20 years has shown a marked decrease in the use of these products and a subsequent reduction in environmental concern (Rust *et al.* 2014; Price and Morris 2013, Harper 2011). In addition, the proposed action is for sites in federal waters 3 to 200 nm from shore, which are predominantly in deeper waters than the study sites described in the literature. Deep water sites typically have currents adequate to dilute the effects of excess nutrients and other chemicals used in aquaculture operations. Price and Morris (2013) note that "siting farm operations in deep waters with sufficient flushing rates would minimize water quality impacts." Further, existing regulations for CAAPFs and antibiotics that would be required for all alternatives would adequately protect water quality.

From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Tori Spence - NOAA Federal](#)
Subject: RE: AquaPEIS-final draft + quick questions
Date: Friday, May 7, 2021 10:40:00 AM
Attachments: [image001.png](#)

Yes thank you Tori! I saw it and downloaded it (and confirming that it is in the fed register today— (comments due August 5th!?!))

I am forwarding it to EPA folks. I will let them know to distribute widely, I think my place-based colleague Hudson Slay is on a couple different task forces and groups that he could share (likely NOAA is on these too).

I know we are planning to bring it up at our regular interagency meeting with the military (I didn't catch the date on that, I think soon).

Do you have public meetings scheduled?

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Thursday, May 6, 2021 10:57 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Subject: RE: AquaPEIS-final draft + quick questions

Hey Stephanie,

Hope you're doing well! You might have noticed but the PEIS is *actually* uploaded to eNEPA 😊 Thank you, again, for all your help so far.

We're making sure to notify everyone that may want to know—are you aware of anyone based in Hawaii that we should contact?

Mahalo,
Tori

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Wednesday, April 21, 2021 3:39 PM
To: 'Gordon, Stephanie (Skophammer)' <GORDON.STEPHANIES@EPA.GOV>
Subject: RE: AquaPEIS-final draft + quick questions

Mahalo, Stephanie!

Yes, thank you for the reminder :-D

-Tori

From: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Sent: Wednesday, April 21, 2021 12:56 PM
To: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Subject: RE: AquaPEIS-final draft + quick questions

Okay, just a reminder that if you want it in the federal register next Friday, it needs to be uploaded by Monday at 10AM Eastern.

I think you probably already know that—more info here—

<https://www.epa.gov/nepa/e-nepa-environmental-impact-statement-filing-deadline>

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Wednesday, April 21, 2021 3:52 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Subject: RE: AquaPEIS-final draft + quick questions

Thanks, Stephanie,

That's great news! We're to the point that there are a lot of cooks figuring out how/when to publish, so it's honestly a relief to hear it's so simple from your end!

Alright, we'll probably be uploading it within the week, if not early next week (fingers crossed).

Mahalo,
Tori

From: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Sent: Wednesday, April 21, 2021 12:42 PM
To: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Subject: RE: AquaPEIS-final draft + quick questions

Hi Tori-

Glad you are getting ready to release this, I am sure it is a huge relief for you! (In my experience, most project managers go on vacation during the public comment period-!)

All you need to do is upload the documents and fill out the information in e-NEPA. EPA will publish a notice in the federal register on Friday that says that your document, in addition to however many others are uploaded that same week, are available. There is no high level clearance and we do not do anything else to advertise that the document is open for public comment.

Once it is in there, I will be able to see it and download it and will add it to my review schedule!

Hope this helps.

-Stephanie

Stephanie Skophammer Gordon
U.S. Environmental Protection Agency, Region 9

Environmental Review Branch (TIP-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
Pronouns: she/her
gordon.stephanieS@epa.gov

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Wednesday, April 21, 2021 3:27 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Subject: AquaPEIS-final draft + quick questions

Aloha Stephanie!

We've gotten all the clearance set for submitting the Aquaculture PEIS to NEPA! Right now we're working on rollout plans and have a couple quick questions:

Does the PEIS need to go through a higher level clearance process at EPA?

If we do a higher interest rollout do we need to bring in EPA comms and if so, whom?

I've attached the final draft PEIS for you; happy to hop on the phone if it's easier!

Mahalo,
Tori

Tori Spence McConnell
([she/her/hers](#))
Fishery Policy Analyst--Aquaculture
Pacific Islands Regional Office (PIRO)
NOAA Fisheries | U.S. Department of Commerce
Office: +1 (808) 725-5186
www.fisheries.noaa.gov



From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Tori Spence - NOAA Federal](#)
Cc: [Ariel Jacobs - NOAA Federal](#)
Subject: RE: Cooperating agency-PIRO Aquaculture PEIS- we're already official
Date: Friday, September 11, 2020 10:57:00 AM
Attachments: [EPA Comments on the Aquaculture PEIS.pdf](#)
[Cooperating agency contacts for Aquaculture EIS.msg](#)
[EPA Cooperating Agency and Scoping Comments for Aquaculture PEIS.msg](#)
[RE Cooperating Agency Contacts for Aquaculture PEIS.msg](#)

Hi Tori,

I found something which I was not expecting to find which is, you already asked us and we already accepted cooperating agency status on this project in our scoping comment letter in Oct 2016!

I am attaching the letter we signed in 2016 and a follow-up email I found.

I cannot find the original request letter. Perhaps it is only in a hard copy in my office? I guess one of the benefits from working from home is that 100% is digital now, so the hard copy/digital divide is being eliminated.

Given this, I would not feel a need to engage with a whole new letter. I am sorry I could not find this before, I did not think to check the scoping letter.

-Stephanie

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>
Sent: Wednesday, September 9, 2020 7:25 PM
To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>
Cc: Ariel Jacobs - NOAA Federal <ariel.jacobs@noaa.gov>
Subject: Re: Cooperating agency-PIRO Aquaculture PEIS

Aloha Stephanie,

Thank you for these examples and further guidance! I'll work on our end to get a written request out to your leadership. In my notes, it looks like either your manager or section chief would be the appropriate recipient-do you have a preference? And if so, can you please share their name and email?

Mahalo,
Tori

On Wed, Sep 9, 2020 at 2:03 PM Gordon, Stephanie (Skophammer)
<GORDON.STEPHANIES@epa.gov> wrote:

Hi Tori,

Yes thank you for reminding me about this! I dropped the ball and got caught up last week- anyway, I have attached two separate cooperating agency request and acceptance letters for Bureau of Reclamation and US Army Corps of Engineers.

Here is the link to our website, I am only sending because it has links to the regs that explain our

NEPA 309 Review Role. <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>

We want to be a cooperating agency because we would like to help meet your goals for improving environmental outcomes with a thorough document, and also because we have special expertise for aquaculture permitting for discharge in the ocean. But I do not think this should be a lift or a burden so if it is, I am happy to just keep operating as is. We are not interested in signing an MOU because we don't have the resources for that process.

I am looking at the Admin Draft you sent me and I am also talking with EPA's Ocean coordinator, Hudson Slay, and our NPDES permitting office too (as EPA would be responsible for a discharge permit for any aquaculture facility in federal waters).

As this is NOAA's action and it's not site-specific, I am not anticipating very many comments, however, I still haven't dug up our past comments so I want to look at those to remind myself of what I said last time.

I will make sure to have anything to you by the end of the month, but I think I can send you something earlier than that.

-Stephanie

Stephanie Skophammer Gordon

U.S. Environmental Protection Agency, Region 9

Environmental Review Branch (TIP-2)

75 Hawthorne St.

San Francisco, CA 94105

(415) 972-3098

gordon.stephanieS@epa.gov

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Sent: Tuesday, September 8, 2020 10:47 AM

To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Cc: Ariel Jacobs - NOAA Federal <ariel.jacobs@noaa.gov>

Subject: Cooperating agency-PIRO Aquaculture PEIS

Aloha Stephanie,

I hope you've been doing well! Thank you, again, for your time on Aug 28 to have a conversation about a few next steps with our aquaculture PEIS.

I wanted to check in about the next steps needed for establishing EPA as a cooperating agency. In my notes, it sounds like you might have some examples of emails sent from RAs in the past-would you be willing to share those with us?

Mahalo and hoping life is a little cooler than this past weekend!

Tori

From: [Gordon, Stephanie \(Skophammer\)](#)
To: [Tori Spence - NOAA Federal](#)
Cc: [Ariel Jacobs - NOAA Federal](#)
Subject: RE: Cooperating agency-PIRO Aquaculture PEIS
Date: Wednesday, September 9, 2020 4:54:00 PM
Attachments: [2020-07-21 EPA CoopAgency acceptance Del Puerto.pdf](#)
[2020-02-13 EPA CoopAgency acceptance Shoreline Phase II.pdf](#)
[AJacobson - Ltr 1 signed- DPCR Coop Agency Request EPA for EIS \[24\].pdf](#)
[2020.07.20-EIS-Coop Agency Req EPA-201900899.pdf](#)

Hi Tori,

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Environmental Review Branch (TIP-2)

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gordon.stephanies@epa.gov

From: Tori Spence - NOAA Federal <tori.spence@noaa.gov>

Sent: Tuesday, September 8, 2020 10:47 AM

To: Gordon, Stephanie (Skophammer) <GORDON.STEPHANIES@EPA.GOV>

Cc: Ariel Jacobs - NOAA Federal <ariel.jacobs@noaa.gov>

Subject: Cooperating agency-PIRO Aquaculture PEIS

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Tori

Tori Spence McConnell (she/her/hers)
Fishery Policy Analyst--Aquaculture
Pacific Islands Regional Office (PIRO)
NOAA Fisheries | U.S. Department of Commerce
Office: +1 (808) 725-5186
www.fisheries.noaa.gov

From: [Sablad, Elizabeth](#)
To: [Gordon, Stephanie \(Skophammer\)](#)
Subject: RE: Pacific Islands Region Aquaculture Plan - PEIS
Date: Friday, September 9, 2016 7:56:15 AM

Hi Stephanie,

Thanks for keeping me in the loop. I hadn't seen the letter yet. I've asked Jamie Marincola if he wants to be included in the meeting with the PIO, since he's our Territories coordinator. My electronic calendar is usually up to date. Regarding the other call, let me know what you find out about the topic.

Thanks,
Elizabeth

Elizabeth Sablad
Senior Permits Specialist
NPDES Permits Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3044

-----Original Message-----

From: Gordon, Stephanie (Skophammer)
Sent: Thursday, September 08, 2016 4:47 PM
To: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>
Subject: FW: Pacific Islands Region Aquaculture Plan - PEIS

Hi Elizabeth,

I am attaching the incoming cooperating agency letter for the NOAA project. I just got the hard copy today and saw you were cc'ed but not sure if that means you got a hard copy too.

We will be accepting the request and I am going to prepare our standard acceptance letter.

I will check calendars tomorrow and try to arrange a meeting for us to talk aquaculture with Carl and Michael in the Pac Islands office. I also have a call into Jessica Trice at HQ. We have our NEPA national meeting coming up in 2 weeks and one of the topics is:

Mini-Topics (Each topic moderated by one Region; all Regions present and discuss challenges and successes, lessons learned: Discuss EPA's Part 6 compliance involving the Outer Continental Shelf (OCS) NPDES General Permit EA for the Eastern Gulf of Mexico- Dan Holliman, Region 4

I don't know if this is related to aquaculture, but I will find out. If it is, would you be interested in calling in with me? Tu Sept 20 10:30-11. Short and sweet but it will be great to hear lessons learned/contacts/etc. etc.

-Stephanie

Stephanie Skophammer Gordon
U.S. Environmental Protection Agency, Region 9 Environmental Review Section (ENF-4-2)
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3098
New email: gordon.stephanieS@epa.gov
Note the S before the @

From: [Sablad, Elizabeth](#)
To: [Tyler, Kip](#)
Cc: [Gordon, Stephanie \(Skophammer\)](#)
Subject: RE: Scheduling call to discuss EPA NPDES permit (clarify when need this permit)
Date: Wednesday, May 24, 2017 12:31:46 PM

Hi Kip,

Not sure about recent efforts, except that we are aware of the Pacific Islands programmatic EIS, which I think David Nichols at NMFS is working on. Stephanie Gordon in our NEPA office is aware of that effort and let him know how to request EPA participate as a cooperating agency. I haven't heard more than that. Last time I talked with Diane Windham at NMFS, she was asking whether we would be a cooperating agency if NMFS took on the lead role to run the NEPA process for the Rose Canyon facility proposed offshore of California.

I am interested in listening in on your conversation with HQ on June 7th. Please send me the details.

Also, after we talked last time, I mentioned your info about a facility without permit coverage in federal waters in R9 to Dave Smith and he was curious as to whether you had any more information about it (production size, etc). Let me know.

Thanks!
Elizabeth

Elizabeth Sablad
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75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3044

From: Tyler, Kip
Sent: Wednesday, May 24, 2017 11:42 AM
To: Sablad, Elizabeth <Sablad.Elizabeth@epa.gov>
Subject: FW: Scheduling call to discuss EPA NPDES permit (clarify when need this permit)

[Hi Elizabeth.](#)

[My regional aquaculture coordinator with NMFS is Jess Beck – she was not aware if Dave and Diane were coordinating with you regarding recent federal interagency aquaculture efforts. Just want to make sure that you are in the loop and coordinating with Dave Nichols and Diane Windham with NMFS.](#)

[I am discussing warm water aquaculture threshold issue with EPA HQ on June 7th. Let me know if you want to listen to or participate in the conversation.](#)

[Kip Tyler](#)

w 404.562.9294 | m 404.323.6094

From: Diane Windham - NOAA Federal [<mailto:diane.windham@noaa.gov>]

Sent: Wednesday, May 24, 2017 2:30 PM

To: Jess Beck - NOAA Federal <jess.beck@noaa.gov>

Cc: Susan Bunsick <susan.bunsick@noaa.gov>; David Nichols - NOAA Federal <david.nichols@noaa.gov>; Rich Malinowski <Rich.Malinowski@noaa.gov>; Tyler, Kip <Tyler.Kip@epa.gov>; Laura Hoberecht <laura.hoberecht@noaa.gov>; Kevin Madley - NOAA Federal <kevin.madley@noaa.gov>

Subject: Re: Scheduling call to discuss EPA NPDES permit (clarify when need this permit)

Jess, not sure but Dave and I may have the same EPA contact, as it's all region 9. My contact (so far) has been Elizabeth Sablad (she was part of the offshore interagency working group in HI); there is a different contact for EPA NEPA relative to cooperating agency issues. I'm curious if it's Elizabeth for both Dave and me for NPDES.

Thanks!

Diane

On Wednesday, May 24, 2017, Jess Beck - NOAA Federal <jess.beck@noaa.gov> wrote:

Hi all -

I just spoke to Kip Tyler at EPA Region 4 (Atlanta Office). Their regional staff and HQ folks are discussing the issue re: the need for an EPA NPDES permit for under 100,000 pounds annual production for all federal waters on June 7th. Kip will get back to me/us on where they are on this question after that meeting. Stay tuned...

David - who are the EPA folks you are working with out there in PIRO? Kip (cc'd) would like to know so he can coordinate with them on this effort.

Jess

On Fri, May 19, 2017 at 3:51 PM, Jess Beck - NOAA Federal <jess.beck@noaa.gov> wrote:

Hi Kip - can we chat about this next week? The NMFS Western Pacific staff have some questions about this and it may have implications for their Aquaculture Amendment and NEPA alternatives.

Jess

On Thu, Apr 27, 2017 at 10:18 AM, Tyler, Kip <Tyler.Kip@epa.gov> wrote:

Hi Jess. We are still researching and discussing the issue internally. The best guidance I can give right now is that EPA should be contacted to determine if a NPDES permit is needed for projects of any size. Can we hold off on a meeting for several more weeks?

Kip Tyler

w [404.562.9294](tel:404.562.9294) | m [404.323.6094](tel:404.323.6094)

From: Jess Beck - NOAA Federal [<mailto:jess.beck@noaa.gov>]

Sent: Thursday, April 27, 2017 10:04 AM

To: Tyler, Kip <Tyler.Kip@epa.gov>

Subject: Scheduling call to discuss EPA NPDES permit (clarify when need this permit)

Hi Kip,

Just circling back on this issue -- do you have time to chat with myself and the other Aquaculture Coordinators in the coming weeks? May I suggest May 10th at 2pm eastern time? (or any other day/time that would be appropriate)

Thanks,
Jess

--

Jessica Beck-Stimpert, Ph.D. <Jess.Beck@noaa.gov>

Regional Aquaculture Coordinator

NOAA Fisheries Southeast Regional Office

Saint Petersburg, FL

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